

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

United State of America,

Plaintiff,

Vs.

Case No.: 2:24-cv-10518-JJCG-DRG

Hon.:

Real Property located at  
3865 Stonecrest Road,  
West Bloomfield, MI 48322,

Defendant in rem.

\_\_\_\_\_  
Dawn N. Ison, United States Attorney  
K. Craig Welkener, Assistant United State Attorney  
211 W. Fort St., Suite 2001  
Detroit, MI 48226  
(313) 226-0248  
[Kenton.welkener@usdoj.gov](mailto:Kenton.welkener@usdoj.gov)  
DC Bar No.: 1033585

Michael D. P. Burwell (P32979)  
Marc T. Bowen (P72973)  
Attorneys for Claimant  
100 E. Big Beaver Road, Suite 350  
Troy, MI 48083  
(248) 641-8000  
[mdburwell@brmattorneys.com](mailto:mdburwell@brmattorneys.com)  
[mtbowen@brmattorneys.com](mailto:mtbowen@brmattorneys.com)  
\_\_\_\_\_

**VERIFIED ANSWER TO COMPLAINT FOR FORFEITURE**

NOW COMES Claimant, Lake Michigan Credit Union, by and through its attorneys, BOWEN, RADABAUGH & MILTON, P.C., and for its answer to Complaint for Forfeiture, states as follows:

**Introduction**

1. No contest.
2. No contest.

**Jurisdiction and Venue**

3. No contest.
4. No contest.
5. No contest.
6. No contest.

**Defendants *In Rem***

7. No contest.
8. Claimant admits the Real Property is situated in the Eastern District of Michigan.

**Statutory Basis for Civil Forfeiture**

9. It is submitted that the statute speaks for itself.
10. It is submitted that the statute speaks for itself.

11.It is submitted that the statute speaks for itself.

12.It is submitted that the statute speaks for itself.

13.It is submitted that the statute speaks for itself.

14.It is submitted that the statute speaks for itself.

15.It is submitted that the statute speaks for itself.

**Facts Supporting Forfeiture of Defendant *In Rem***

16.This Defendant has no knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore, neither admits nor denies same, but leaves Plaintiff to their proofs.

17.This Defendant has no knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore, neither admits nor denies same, but leaves Plaintiff to their proofs.

18.This Defendant has no knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore, neither admits nor denies same, but leaves Plaintiff to their proofs.

19.This Defendant has no knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore, neither admits nor denies same, but leaves Plaintiff to their proofs.

20. This Defendant has no knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore, neither admits nor denies same, but leaves Plaintiff to their proofs.

21. This Defendant has no knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore, neither admits nor denies same, but leaves Plaintiff to their proofs.

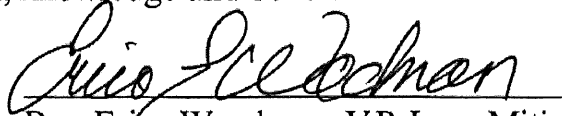
**Claim for Relief**

22. This Defendant hereby incorporates by reference its answers to paragraphs 1 through 21, as if set forth herein word for word.

23. This Defendant has no knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore, neither admits nor denies same, but leaves Plaintiff to their proofs.

WHEREFORE, pursuant to the claim made against the Defendant *in rem* and in response to the Notice of Complaint for Forfeiture, Claimant, Lake Michigan Credit Union, prays that this Court find its mortgage interest in said property to be valid and superior to all other claims and award such other and further relief as shall be agreeable to equity and good conscience.

I, Erica Woodman, V.P. of Loss Prevention for Lake Michigan Credit Union, attest to response and answer to the Complaint, under oath and subject to penalties of perjury to the best of my information, knowledge and belief.



By: Erica Woodman, V.P. Loss Mitigation

Respectfully Submitted,

BOWEN, RADABAUGH & MILTON, P.C.

/s/ Michael D. P. Burwell (P32979)

Michael D. P. Burwell (P32979)

Marc T. Bowen (P72973)

BOWEN, RADABAUGH & MILTON, P.C.

100 E. Big Beaver Road, Suite 350

Troy, MI 48083

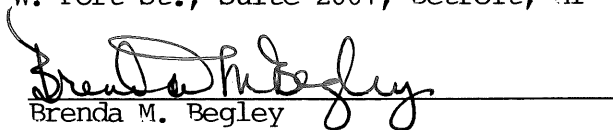
(248) 641-8000

email: [mdburwell@brmattorneys.com](mailto:mdburwell@brmattorneys.com)

Dated: April 3, 2024

**PROOF OF SERVICE**

I certify that on April 5, 2024 the foregoing document was electronically filed with the Clerk of the Court and electronically served upon all parties of record using the Court's electronic filing system and via first class mail to Dawn N. Ison, United States Attorney at 211 W. Fort St., Suite 2001, Detroit, MI 48226.



Brenda M. Begley